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Subject

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action - Former Plainwell Impoundment Monthly Report (August 2007)

If you have any questions, please do not hesitate to contact me.

INDUSTRIAL

Date

Contact

Dear Sam:

Attached is the sixth monthly progress report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site Time-Critical Removal Action. This progress report is submitted in accordance with Section 19A of the February 2007 Administrative Settlement Agreement and Order on Consent for Removal Action (Docket No. V-W-07-C-863).

Steve Garbaciak

September 17, 2007

312.332.4937 ext. 12

E-mail steve.garbaciak@ arcadis-us.com

Our ref B0064530 014

Sincerely,

ARCADIS of New York, Inc.

Stephen Garbaciak Jr., P.E

Principal Engineer/Vice Presider/It

Attachment

Copies

Paul T. Bucholtz, MDEQ James Saric, USEPA

Bonnie A. Barnett, Esq., Drinker Biddle & Reath LLP Steven D Cook, Esq., Millennium Holdings, LLC J. Michael Davis, Esq., Georgia-Pacific Corporation Mellonie S. Fleming, Esq., Georgia-Pacific Corporation Mark E Tapp, Millennium Holdings, LLC Paul A Montney, P E, Georgia-Pacific Corporation L Chase Fortenberry, P G, Georgia-Pacific Corporation Mark P. Brown, Ph.D , Georgia-Pacific Corporation

Imagine the result

### MONTHLY REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/ KALAMAZOO RIVER SUPERFUND SITE TIME-CRITICAL REMOVAL ACTION (TCRA) – FORMER PLAINWELL IMPOUNDMENT

**REPORT #6, AUGUST 2007** 

### PREPARED BY ARCADIS BBL SEPTEMBER 17, 2007

ON BEHALF OF THE KALAMAZOO RIVER STUDY GROUP

**SUBMITTED TO** 

SAMUEL BORRIES, ON-SCENE COORDINATOR UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

#### **REPORT #6, AUGUST 2007**

#### Significant Developments and Activities During the Period

- On August 2, the United States Environmental Protection Agency (USEPA) issued a press release titled Kalamazoo River Cleanup Update: 2008 Disposal Plans
- On August 2, representatives of the USEPA, Michigan Department of Environmental Quality (MDEQ), and the Kalamazoo River Study Group (KRSG) walked Removal Areas 5 and 6A. The KRSG representative raised concerns that the project would likely fall behind schedule and go over budget if the MDEQ plans to regularly walk completed excavation areas and request additional removal activities.
- On August 7, the KRSG submitted a Subcontractor Qualification Notification for JF New, Inc. to the USEPA, as required by Paragraph 11 of the TCRA Administrative Settlement Agreement and Order on Consent (AOC).
- On August 7, the KRSG submitted a revised copy of the 12<sup>th</sup> Weekly Construction Report for the Plainwell TCRA to the USEPA.
- On August 7, the KRSG submitted copies of the first eleven weekly construction reports for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA from May, June and July to the USEPA.
- On August 14, the KRSG submitted a letter via e-mail to the USEPA regarding sediment removal volume estimates for the former Plainwell Impoundment TCRA.
- On August 15, the KRSG submitted copies of the 13<sup>th</sup> and 14<sup>th</sup> Weekly Construction Report for the Plainwell TCRA to the USEPA and to the MDEQ.
- On August 15, the KRSG submitted the fifth Monthly Report for the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site TCRA for July 2007 to the USEPA.
- On August 17, the KRSG received a copy of the USEPA fact sheet titled Plainwell PCB Cleanup Proceeding on Schedule.
- On August 21, a Stakeholders meeting was held onsite between the USEPA, the MDEQ, the Michigan Department of Natural Resources (MDNR) and the KRSG
- On August 21 and August 28, the KRSG submitted copies of analytical data from TCRA sampling activities to the USEPA.
- On August 21, the KRSG submitted a copy of the 15<sup>th</sup> Weekly Construction Report for the Plainwell TCRA to the USEPA and to the MDEQ

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- On August 22, the KRSG attended the USEPA-hosted Open House/Question and Answer Session in Plainwell
- On August 22, the USEPA submitted to the KRSG copies of analytical data for one sediment split sample (K55271) and one water treatment split sample (W SA1N Efflu 0002).
- On August 29, the KRSG submitted a copy of the 16<sup>th</sup> Weekly Construction Report for the Plainwell TCRA to the USEPA and to the MDEQ.
- By August 31, the KRSG had obtained property access agreements, as required by Paragraph 23 of the TCRA AOC (Table A), from eight property owners.

#### Data Collected and Field Activities Conducted During the Period

- During the week of August 1, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures); completed installation of Staging Area 2S; began grading for the construction of Staging Area 5S, completed excavation in Removal Area 6A; continued excavation in Removal Area 5, Upland Area 3A2 and Island 3; began placing restoration stone at Removal Area 6A; and received shipments of steel sheeting for the cofferdam installation. Five sediment confirmation samples (K55271 through K55275) were collected from Removal Area 6A for PCB analysis. Two surface water samples (K30633 and K30634) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 5 for PCB analysis. A rinse blank (K30635) was also collected. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.
- During the week of August 6, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures); continued installation of Staging Area 5S; completed construction of a temporary dock near the Plainwell Dam; continued excavating material from Removal Area 5 and Island 3; completed excavation of material from Removal Area 6B; and placed restoration stone at Removal Area 3A and at Removal Area 6A Six sediment confirmation samples (K55276 through K55281) were collected from Upland Area 3A2, Island 3, Removal Area 5 and Removal Area 6A for PCB analysis. Two surface water samples (K30636 and K30637) were collected from locations 300 feet downstream and 100 feet upstream, respectively, of Removal Area 6A for PCB analysis. A rinse blank (K30638) was also collected. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal
- During the week of August 13, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security

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measures), continued excavating material from Island 3 and Removal Area 6A; started and completed excavation of material from Removal Area 2B (the 450 linear feet of material on the City of Plainwell property that the USEPA mandated be removed in the July 10, 2007 letter titled Removal Area 2B (additional removal on City of Plainwell property)); started excavation of material from Removal Area 3B and Removal Area 4B; started the installation of the cofferdam near the Plainwell Dam, treated water at Staging Area 1N; and continued post-excavation activities on the north side of the Kalamazoo River. No sediment confirmation samples were collected. Two surface water samples (K30639 and K30640) and one duplicate sample (K30641 - duplicate of K30640) were collected from 300 feet downstream and 100 feet upstream, respectively, of Removal Area 3B for PCB analysis. A rinse blank (K30642) was also collected. Waste water samples W SA1N Influ 0003, W SA1N MidA 0003 and W\_SA1N Efflu 0003 were collected from the influent port, the midpoint port on the right side of the treatment system and the effluent port on the right side of the water treatment system, respectively, located at Staging Area 1N prior to discharge. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

- During the week of August 20, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures); continued excavating material from Island 3, Removal Area 3B and Removal Area 4B; backfilled Upland Areas 3A1 and 3A2, continued the installation of the cofferdam near the Plainwell Dam; continued treating water at Staging Area 1N; and continued post-excavation activities on the north and south sides of the Kalamazoo River. Two sediment confirmation samples (K55282 and K5283) and one duplicate sample (K55284 – duplicate of K55283) were collected from Island 3. Two surface water samples (K30643 and K30644) were collected from 300 feet downstream and 100 feet upstream, respectively, of Removal Area 3B for PCB analysis. A rinse blank (K30645) was also collected. Waste water samples W SA1N Influ 0004, W SA1N Influ 0005 and W SA1N Influ 0006 (influent port), W SA1N MidA 0004, W SA1N MidA 0005 and W SA1N MidA 0006 (midpoint port, right side), W SA1N MidB 0001, W SA1N MidB 0002 and W SA1N MidB 0003 (midpoint port, left side), W SA1N EffluA 0004, W\_SA1N\_EffluA\_0005 and W SA1N EffluA 0006 (effluent port, right side) and W SA1N EffluB 0001, W SA1N EffluB 0002 and W SA1N EffluB 0003 (effluent port, left side) were collected from the water treatment system located at Staging Area 1N prior to the three water discharge events. A duplicate of sample W SA1N EffluB 0003 (W SA1N Dup 0001) was also collected from the left effluent port. Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.
- During the week of August 27, the KRSG continued site preparation (clearing and grubbing, installing silt fences, constructing access roads, staking excavation limits, and installing site security measures); continued excavating material from Removal Area 5, Removal Area 3B, Removal Area 4B and Upland Area 4B1, continued the installation of the cofferdam near the Plainwell Dam; continued treating water at Staging Area 1N; and continued post-excavation activities on the north and south sides of the Kalamazoo River. Seventeen sediment confirmation samples (K55285 through K55301) were collected from Upland Area 4B1, Removal Area 5, Removal Area 3B and Removal

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Area 4B Two surface water samples (K30646 and K30647) were collected from 300 feet downstream and 100 feet upstream, respectively, of Removal Area 4B for PCB analysis. A rinse blank (K30648) was also collected. One topsoil sample (K25728) was collected from a topsoil source pile located on Balkema Excavating property. Waste water samples W\_SA1N\_Influ\_0007 and W\_SA1N\_Influ\_0008 (influent port), W\_SA1N\_MidA\_0007 and W\_SA1N\_MidA\_0008 (midpoint port, right side), W\_SA1N\_MidB\_0004 and W\_SA1N\_MidB\_0005 (midpoint port, left side), W\_SA1N\_EffluA\_0007 and W\_SA1N\_EffluA\_0008 (effluent port, right side) and W\_SA1N\_EffluB\_0004 and W\_SA1N\_EffluB\_0005 (effluent port, left side) were collected from the water treatment system located at Staging Area 1N prior to the three water discharge events (the samples collected on August 24 were discharged on August 27). Table B summarizes the samples collected. Solidification of the excavated material continued at Staging Area 1N using a pug mill with cement, and the solidified material from the pug mill was loaded into trucks and transported to the C&C Landfill in Marshall, Michigan (non-TSCA material) for disposal.

#### **Laboratory Data Received During the Period**

- During the week of August 1, the KRSG received laboratory data for confirmation samples K55271 through K55275 and surface water samples K30627 through K30632 (which were collected in July) (Table B)
- During the week of August 6, the KRSG received laboratory data for confirmation samples K55276 through K55280, pre-construction access road samples K25719 through K25726 (which were collected in July) and Staging Area 2S pre-construction composite sample K25727 (which was collected in July) (Table B).
- During the week of August 13, the KRSG received laboratory data for confirmation sample K55281; surface water samples K30633 through K30635; and waste water samples W\_SA1N\_Influ\_0003, W\_SA1N\_MidA\_0003 and W\_SA1N\_Efflu\_0003 (Table B).
- During the week of August 20, the KRSG received laboratory data for confirmation samples K55282 through K55284, the USEPA split sample of sediment sample K55271 (APS-080107-05-SD/K55271); surface water samples K30636 through K30638; waste water samples W\_SA1N\_Influ\_0004, W\_SA1N\_MidA\_0004, W\_SA1N\_MidB\_0001, W\_SA1N\_EffluA\_0004, W\_SA1N\_EffluB\_0001, W\_SA1N\_Influ\_0005, W\_SA1N\_MidA\_0005, W\_SA1N\_MidB\_0002, W\_SA1N\_EffluA\_0005, W\_SA1N\_EffluB\_0002 and APS-073007-WT-01/W\_SA1N\_Efflu\_0002 (USEPA split sample of waste water sample W\_SA1N\_Efflu\_0002, which was collected in July) (Table B).
- During the week of August 27, the KRSG received laboratory data for confirmation samples K55285 through K55301, surface water samples K30639 through K30645; and waste water samples W\_SA1N\_Influ\_0006, W\_SA1N\_MidA\_0006, W\_SA1N\_MidB\_0003, W\_SA1N\_EffluA\_0006, W\_SA1N\_EffluB\_0003, W\_SA1N\_Influ\_0007, W\_SA1N\_MidA\_0007, W\_SA1N\_MidB\_0004, W\_SA1N\_EffluB\_0007, W\_SA1N\_EffluB\_0004, W\_SA1N\_MidB\_0005, W\_SA1N\_EffluB\_0008 and W\_SA1N\_EffluB\_0005 (Table B).

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 The KRSG is awaiting analytical results for surface water samples K30646 through K30648 and topsoil sample K25728.

#### Issues Encountered and Actions Taken

- On August 7, work was suspended due to heavy thunderstorms accompanied by lightning throughout the area
- On August 13, the dust action level was reached during excavation and sediment staging activities near Staging Area 2S. Work was halted until water could be applied to the area for dust control.
- On August 14, a visible silt plume was observed during removal activities near Removal Area 2B.
   Work was immediately halted until the turbidity curtain could be repaired. The turbidity reading action limit was not reached.
- On August 15, recreational boaters were observed near Removal Area 2B. Work was halted until the
  boaters left the area. The boaters were informed that boat traffic in this stretch of the river was
  prohibited. No regulators were notified of the boaters at that time.
- On August 15, the long reach excavator struck an overhead cable on the Keeler property. No injuries
  were reported, Mr. Keeler was immediately notified, and the line was repaired on the morning of
  August 16.
- On August 16, three pairs of sheet pile encountered refusal before reaching the design elevation.
  KRSG personnel confirmed that the achieved drive elevations were acceptable. In order to
  compensate for the difficulty in driving the sheet pile to the designated depth, the target drive depth
  was amended on August 20 to a minimum of 30 feet of embedment past the mudline and two feet of
  embedment into Stratum D.
- On August 22, no in-stream excavation activities could occur in Removal Areas 3B or 4B due to water
  entering and exiting the Removal Areas over the turbidity curtain. Curtain repair was finished on
  August 23, and excavation activities resumed.
- On August 28, field personnel attempted to collect confirmation samples from Removal Area 5. At
  that time, it was determined that the access road in this area had not been fully removed. This
  material was excavated on August 29 and samples were collected on the same day.
- On August 30, a local resident was spotted trying to enter the 12<sup>th</sup> Street Dam work area. The
  resident was stopped by KRSG personnel and informed that he could not enter the work area, but
  information about the project could be found at the Kalamazoo River Cleanup website. The resident
  was cooperative and left the work area.

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#### **Developments Anticipated During the Next Reporting Period**

- During the week of September 3, the KRSG is scheduled to continue cofferdam installation, continue post-excavation and revegetation work upstream of U S. 131 and begin removing TSCA material from Removal Area 3B.
- During the week of September 10, the KRSG is scheduled to finish installing the cofferdam, continue post-excavation and revegetation work upstream of U.S 131, begin removal of Staging Area 1N, begin construction of Staging Area 3S and begin excavation of Islands 1 and 2.
- During the week of September 17, the KRSG is scheduled to hold a Stakeholders Meeting at the site, continue post-excavation and revegetation efforts, continue excavation of Islands 1 and 2 and begin excavation of Removal Area 6B.
- During the week of September 24, the KRSG is scheduled to begin excavation of Upland Area 6B1 and continue post-excavation and revegetation efforts.
- Throughout September, the KRSG will continue to negotiate property access agreements as required by Paragraph 23 of the TCRA AOC (Table A).
- Throughout September, the KRSG will, as necessary, continue to submit Subcontractor Qualification Notifications to the USEPA, as required by Paragraph 11 of the TCRA AOC.

#### Table A — Summary of Property Access Agreements (as of August 31, 2007

Date Sent	Property Owner	Status
3/19/2007	A C Geenen Associates	no response
3/9/2007	Aggregate Industries (Bill Smith Sand and Gravel)	accepted
3/9/2007	Allen Robinson	accepted
3/9/2007	Balkema Excavating	accepted
3/9/2007	Brad Keeler	accepted
3/9/2007	City of Plainwell	accepted
3/26/2006	Consumers Energy	in negotiations
3/9/2007	Meijer, Inc.	in negotiations
3/21/2007	Plainwell Group LLC	no response
3/16/2007	Robert Foster Trust	rejected
3/9/2007	Robert Keeler Trust	accepted
3/9/2007	Rolfe Family Trust	accepted
3/16/2007	Shirley Foster	no response
3/9/2007	Steven Peterson	accepted

#### Table B — Summary of Samples Collected and Data Received in August 2007

Sample ID	Sample Date	Data Received	Sample Delivery	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action Limit	Response Action			
a. Josephia.					್ಷ್ಮ Soil Samples							
K25719					Access road on City of Plainwell property (every 200 feet)	PCBs	< 0 330	-	None, baseline sample			
K25720					Access road on City of Plainwell property (every 200 feet)	PCBs	< 0 330	-	None, baseline sample			
K25721	]			:	Access road on City of Plainwell property (every 200 feet)	PCBs	< 0 330	•	None, baseline sample			
K25722	}	24/07 08/06/07	08/06/07	08/06/07			Access road on City of Plainwell property (every 200 feet)	PCBs	< 0 330	-	None, baseline sample	
K25723	07/24/07				08/06/07	08/06/07	08/06/07	073085	KAR Labs	Access road on City of Plainwell property (every 200 feet)	PCBs	< 0 330
K25724					Access road on City of Plainwell property (every 200 feet)	PCBs	< 0 330	-	None, baseline sample			
K25725									Access road on City of Plainwell property (every 200 feet)	PCBs	< 0 330	-
K25726									Access road on City of Plainwell property (every 200 feet)	PCBs	< 0 330	-
K25727	]				Staging Area 2S composite sample	PCBs	< 0 330	-	None, baseline sample			
K25728	08/30/07	•	-	KAR Labs and TAL	Backfill collected from fill pile on Balkema property	TPH, total PCBs, TCL VOCs, TCL SVOCs, RCRA Metals, TCL pesticides, organic content, pH, grain size, and gradiation	NR	-	-			
T GENET	Halla Co		108	2世 .	Sediment Confirmation Samp	oles	•		247			
K55271 <sup>1</sup>		08/02/07	073163	KAR Labs			< 0 330	4	None			
[K55271] APS-080107-05- SD/K255271		08/22/07	0708751	TriMatrix Laboratories	RA 6A, Grid 2	PCBs	0 22	4	None			
K55272	08/01/07				RA 6A, Grid 3	PCBs	< 0 330	4	None			
K55273		00/00/07	09/03/07	00/02/07	072162	KAR Labs	RA 6A, Grid 4	PCBs	< 0 330	4	None	
K55274	08/02/07	2/07 073163	NAR Laus	RA 6A, Grid 5	PCBs	0 42	4	None				
K55275				RA 6A, Grid 6	PCBs	< 0 330	4	None				
K55276	08/08/07 08/09/07				Upland Area 3A2, Grid 1	PCBs	0 64	4	None			
K55277			08/09/07 073293	KAR Labs	Island 3, Grid 2	PCBs	< 0.330	44	None			
K55278				IONIX Labs	Island 3, Grid 1	PCBs	< 0 330	4	None			
K55279					!		RA 5, Grid 1	PCBs	< 0 330	4	None	
K55280	08/09/07	08/10/07	073328	KAR Labs	. RA 6A, Grid 1	PCBs	< 0 330	4	None			
K55281	08/12/07	08/13/07	073352	KAR Labs	RA 6A, Grid 7	PCBs	< 0 330	4	None			

See Notes on Page 4

#### Table B — Summary of Samples Collected and Data Received in August 2007

Sample ID	Sample Date	Data Received	Sample Delivery	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action Limit	Response Action					
K55282	i :				Island 3, Grid 4	PCBs	< 0 330	4	None					
K55283	08/21/07	08/22/07	073474	KAR Labs	1-112 012	PCBs	< 0 330	4	None					
[K55284]	İ				Island 3, Grid 3	PCBS	< 0 330	4	None					
K55285					RA 4B, Grid 1	PCBs	< 0 330	4	None					
K55286	1				RA 4B, Grid 2	PCBs	0 38	4	None					
K55287	08/27/07	08/28/07	073568	KAR Labs	RA 4B, Grid 3	PCBs	< 0 330	4	None					
K55288	1				RA 3B, Grid 8	PCBs	< 0 330	4	None					
K55289	1				RA 3B, Grid 7	PCBs	< 0 330	4	None					
K55290	08/29/07	08/30/07	073596	KAR Labs	RA 5, Grid 4	PCBs	< 0 330	4	None					
K55291	-				RA 5, Grid 3	PCBs	< 0 330	4	None					
K55292	1		073614	KAR Labs	RA 4B, Grid 4	PCBs	0 470	4	None					
K55293	08/29/07	08/30/07			RA 3B, Grid 6	PCBs	0 370	4	None					
K55294	1				RA 3B, Grid 5	PCBs	22	4	None					
K55295	1				RA 3B, Grid 4	PCBs	0 590	4	None					
K55296					RA 4B, Grid 9	PCBs	18	4	None					
K55297	1			KAR Labs	RA 4B, Grid 5	PCBs	<0 330	4	None					
K55298	00/00/07	00/04/07	070000		RA 4B, Grid 6	PCBs	0 750	4	None					
K55299	08/30/07	08/31/07	073636		RA 4B, Grid 7	PCBs	<0 330	4	None					
K55300	1				RA 4B, Grid 8	PCBs	<0 330	4	None					
K55301	1				Upland Area 4B1, Grid 1	PCBs	<0 330	4	None					
-					Water Column Samples	-	7.							
K30627					300' downstream of RA 4	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30628	07/19/07	08/02/07	7 073008	KAR Labs	100' upstream of RA 4	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30629	1				Rinse Blank	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30630									1	300' downstream of RA 4	PCBs	<0 0001 mg/L	2e-4 mg/L	None
K30631	07/26/07 08/06/07	08/06/07	073117	KAR Labs	100' upstream of RA 4	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30632	l				Rinse Blank	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30633					300' downstream of RA 5	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30634	08/02/07 08/13/07	08/13/07	073209	KAR Labs	100' upstream of RA 5	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30635					Rinse Blank	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30636	08/09/07 08/22/07		073338		300' downstream of RA 6A	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30637		08/22/07		KAR Labs	100' upstream of RA 6A	PCBs	<0 0001 mg/L	2e-4 mg/L	None					
K30638				Rinse Blank	PCBs PCBs	<0 0001 mg/L	2e-4 mg/L	None						
K30639	08/16/07 08/28/07			300' downstream of RA 3B	PCBs	<0 0001 mg/L	2e-4 mg/L	None						
K30640		073429	9 KAR Labs	100' upstream of RA 3B	PCBs	<0 0001 mg/L	2e-4 mg/L	None						
[K30641]	06/10/0/	08/16/07 08/28/07	013428	IVAN Laus			<0 0001 mg/L							
K30642	Ì			[	Rinse Blank	PCBs	<0 0001 mg/L	2e-4 mg/L	None					

See Notes on Page 4

#### Table B — Summary of Samples Collected and Data Received in August 2007

Sample ID	Sample Date 1	Data Received	Sample Delivery	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action	Response Action							
K30643					300' downstream of RA 3B	PCBs	<0 0001 mg/L	2e-4 mg/L	None							
K30644	08/23/07	08/31/07	073519	KAR Labs	100' upstream of RA 3B	PCBs	<0 0001 mg/L	2e-4 mg/L	None							
K30645					Rinse Blank	PCBs	<0 0001 mg/L	2e-4 mg/L	None							
K30646					300' downstream of RA 4B	PCBs	NR	2e-4 mg/L	-							
K30647	08/30/07	-	-	KAR Labs	100' upstream of RA 4B	PCBs	NR	2e-4 mg/L								
K30648	] _				Rinse Blank	PCBs	NR	2e-4 mg/L								
1 400 1 404 2 404				Tree :	Waste Water Samples	<b>沙</b> 帕	<u> </u>									
[W_SA1N_Efflu_0002] APS- 073007-WT- 01/W_SA1N_EFFLU_0002	07/30/07	08/22/07	0707549	TriMatrix Laboratories	Staging Area 1N, Discharge 2, Effluent Sample, Right Side	PCBs	< 0 00022 mg/L		None							
W_SA1N_Influ_0003		-			Staging Area 1N, Discharge 3, Influent Sample	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = 34 mg/L, No Action Limit							
W_SA1N_MidA_0003	08/14/07	08/15/07	073371	KAR Labs	Staging Area 1N, Discharge 3, Midpoint Sample, Right Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = 4 mg/L, No Action Limit							
W_SA1N_Efflu_0003	]				Staging Area 1N, Discharge 3, Effluent Sample, Right Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L							
W_SA1N_Influ_0004		E					Staging Area 1N, Discharge 4, Influent Sample	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = 16 mg/L, No Action Limit					
W_SA1N_MidA_0004	]				Staging Area 1N, Discharge 4, Midpoint Sample, Right Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, No Action Limit							
W_SA1N_EffluA_0004	08/20/07	08/20/07	08/21/07	073464	KAR Labs	Staging Area 1N, Discharge 4, Effluent Sample, Right Side	PCBs, TSS, Phosphorus	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L, P = 0 05, No Action Limit						
W_SA1N_MidB_0001								Staging Area 1N, Discharge 4, Midpoint Sample, Left Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = 5 mg/L, No Action Limit				
W_SA1N_EffluB_0001													Staging Area 1N, Discharge 4, Effluent Sample, Left Side	PCBs, TSS, Phosphorus	<0 0001 mg/L	2e-4 mg/L
W_SA1N_Influ_0005	08/23/07					Staging Area 1N, Discharge 5, Influent sample	PCBs	<0 0001 mg/L	2e-4 mg/L	None						
W_SA1N_MidA_0005		08/23/07 08/24/04	08/23/07 08/24/04			Staging Area 1N, Discharge 5, Midpoint Sample, Right Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None						
W_SA1N_EffluA_0005				08/24/04 073	073513	KAR Labs	Staging Area 1N, Discharge 5, Effluent Sample, Right Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L					
W_SA1N_MidB_0002						Staging Area 1N, Discharge 5, Midpoint Sample, Left Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None						
W_SA1N_EffluB_0002						Staging Area 1N, Discharge 5, Effluent Sample, Left Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L						

See Notes on Page 4

#### Table B — Summary of Samples Collected and Data Received in August 2007

Sample ID	Sample Date	Data Received	Sample Delivery	Laboratory	Sample Location	Analysis Conducted	PCB Result (mg/kg)	PCB Action	Response Action		
W_SA1N_Influ_0006				KAR Labs	Staging Area 1N, Discharge 6, Influent sample	PCBs	<0 0001 mg/L	2e-4 mg/L	None		
W_SA1N_MidA_0006					Staging Area 1N, Discharge 6, Midpoint Sample, Right Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None		
W_SA1N_EffluA_0006	08/24/07	08/27/07	073537		Staging Area 1N, Discharge 6, Effluent Sample, Right Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L		
W_SA1N_MidB_0003					Staging Area 1N, Discharge 6, Midpoint Sample, Left Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None		
W_SA1N_EffluB_0003					Staging Area 1N, Discharge 6,	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L		
[W_SA1N_Dup_0001]					Effluent Sample, Left Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None		
W_SA1N_Influ_0007				_	Staging Area 1N, Discharge 7, Influent sample	PCBs	0 0002 mg/L	2e-4 mg/L	None		
W_SA1N_MidA_0007		08/28/07			Staging Area 1N, Discharge 7, Midpoint Sample, Right Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None		
W_SA1N_EffluA_0007	08/25/07		08/28/07	073567	KAR Labs	Staging Area 1N, Discharge 7, Effluent Sample, Right Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L	
W_SA1N_MidB_0004						Staging Area 1N, Discharge 7, Midpoint Sample, Left Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None	
W_SA1N_EffluB_0004					Staging Area 1N, Discharge 7, Effluent Sample, Left Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L		
W_SA1N_Influ_0008	08/28/07				Staging Area 1N, Discharge 8, Influent sample	PCBs	<0 0001 mg/L	2e-4 mg/L	None		
W_SA1N_MidA_0008							Staging Area 1N, Discharge 8, Midpoint Sample, Right Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None
W_SA1N_EffluA_0008		08/29/07	073597	KAR Labs	Staging Area 1N, Discharge 8, Effluent Sample, Right Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L		
W_SA1N_MidA_0005						Staging Area 1N, Discharge 8, Midpoint Sample, Left Side	PCBs	<0 0001 mg/L	2e-4 mg/L	None	
W_SA1N_EffluB_0005						Staging Area 1N, Discharge 8, Effluent Sample, Left Side	PCBs, TSS	<0 0001 mg/L	2e-4 mg/L	None TSS = <4 mg/L, Action Limit = 45 mg/L	

#### Notes

1 - Split sample collected by USEPA

TAL - Test America Laboratories

NR - Analytical results not yet received RA - Removal Area

TSS - Total Suspended Solids

P - Phosphorus

TCL - Target Compound List

VOCs - Volatile Organic Compounds

SVOCs - Semi-Volatile Organic Compounds

RCRA - Resource Conservation and Recovery Act

\* Duplicate samples are shown in brackets

\* USEPA split samples are shown in bold and in brackets USEPA split sample IDs are shown in bold and italicized font

TPH - Total Petroleum Hydrocarbons